

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION



FILED

NOV - 1 2019

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
AKRON

UNITED STATES OF AMERICA,

Plaintiff,

v.

VICTORIA A. LADD,

Defendant.

) INFORMATION

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) CASE NO.

5:19 CR 655

Title 18, United States Code,
Section 1344(2)

JUDGE NOGENT

COUNTS 1-10

(Bank Fraud, 18 U.S.C. § 1344(2))

The United States Attorney charges:

General Allegations

At all times material herein:

1. Defendant VICTORIA A. LADD was an employee of Jos Tech Incorporated ("Jos Tech").
2. Jos Tech was a corporation that designed, developed and delivered plastic parts for industrial customers. Jos Tech's place of business was in Kent, Ohio, in the Northern District of Ohio, Eastern Division.
3. Jos Tech maintained a business checking account at Fifth Third Bank, account number XXXXXX2815 ("Jos Tech's bank account"). Fifth Third Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").
4. As part of her employment, Defendant was authorized to use Jos Tech's bank account to pay Jos Tech's business expenses.

5. Defendant resided in the Northern District of Ohio, Eastern Division.

The Scheme to Defraud and Obtain Money

6. From at least as early as January 14, 2013 through on or about January 8, 2018, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant VICTORIA A. LADD knowingly executed and attempted to execute a scheme and artifice to obtain moneys, funds, credits, assets, securities, and other property of Jos Tech that was under the custody and control of Fifth Third Bank, a financial institution, by means of materially false and fraudulent pretenses, representations, and promises.

7. It was part of the scheme that Defendant used her position as a Jos Tech employee to embezzle company funds from Jos Tech's bank account in order to pay her personal bills and expenses.

8. It was further part of the scheme that Defendant wrote checks to herself from Jos Tech's bank account and cashed, or deposited these checks into personal bank accounts that Defendant controlled.

9. It was further part of the scheme that Defendant applied money from Jos Tech's bank account to pay for personal expenditures that Defendant made on credit cards that Defendant controlled.

10. It was further part of the scheme that Defendant conducted financial transactions with the financial institution Fifth Third Bank (1) falsely representing that she was authorized to conduct the transactions and (2) failing to disclose the material fact that she was conducting the transactions for her personal benefit and not on behalf of Jos Tech.

11. As a result of this scheme and artifice to defraud, Defendant fraudulently obtained approximately \$490,462.00.

Execution of the Scheme

12. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant VICTORIA A. LADD did knowingly execute, and attempt to execute, a scheme and artifice to obtain approximately \$490,462.00 of monies and funds under the custody and control of Fifth Third Bank, a financial institution, by means of materially false and fraudulent pretenses, representations, promises, and omissions of material facts, causing monies to be issued on the basis of unauthorized checks and electronic payments, including the following:

Count	Date	Amount	Payee
1	1/14/2013	\$500	Victoria Ladd
2	1/3/2014	\$1,500	Victoria Ladd
3	1/7/2015	\$952.04	Victoria Ladd
4	1/4/2016	\$5,000	Victoria Ladd
5	5/2/2017	\$109.02	VISA
6	7/11/2017	\$252.68	Mastercard
7	8/30/2017	\$36	VISA
8	10/19/2017	\$6,000	Victoria Ladd
9	11/4/2017	\$174	VISA
10	1/3/2018	\$200.89	American Express

In violation of Title 18, United States Code, Section 1344(2).

JUSTIN E. HERDMAN
United States Attorney

By:



MICHELLE M. BAEPLER
Attorney in Charge – Criminal Division
Akron Branch Office